

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

JOSE FRANCISCO ANTUNEZ GARCIA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1-15-CV-543
)	(TSE/JFA)
MOUNT OF LEBANON RESTAURANT, LLC, <i>et al.</i> ,)	
)	
Defendants.)	
)	

AFFIDAVIT OF JOSE FRANCISCO ANTUNEZ GARCIA

1. I am Jose Francisco Antunez Garcia. I am over 21 years of age and am competent to testify to the matters set forth herein. I have personal knowledge of the facts set forth herein.
2. The Defendants, Mount of Lebanon Restaurant, LLC and Kheder Rababeh employed me at the restaurant Mount of Lebanon from March 2011 to November 2014.
3. In the course of my employment, my duties included cutting and otherwise preparing various cuts of fowl and meat.
4. A substantial part of the chicken which I processed had come to our location from Maryland, the District of Columbia, and other states.
5. A substantial part of the beef which I processed came from companies in other states, including one in the District of Columbia.
6. Upon information and belief, some of the beef which I processed originated in Warrenton, Virginia but arrived at Mount of Lebanon having traveled on federal highways.
7. I also helped to unload trucks containing groceries for the store; some of these trucks had come from other states.

8. The Defendants did not use timesheets or any type of clock-in-clock-out system to record the hours that I worked.

9. From March 2012 through March 2013, I normally worked 12 hours per day, 6 days per week for a total of 72 hours per week. The Defendants paid me \$400.00 each week that I worked.

10. From April 2013 through August 2013, I normally worked 12 hours per day, 6 days per week for a total of 72 hours per week. The Defendants paid me \$450.00 each week that I worked.

11. From September 2013 through September 2014, I normally worked 12 hours per day, 6 days per week for a total of 72 hours per week. The Defendants paid me \$650.00 each week that I worked.

12. From October 6, 2014 to November 9, 2014, I normally worked 12 hours per day, 6 days per week for a total of 72 hours per week. The Defendants did not pay me for any of the hours worked during that time.

VERIFICATION

Pursuant to 28 U.S.C. § 1746, I hereby certify, under penalty of perjury, that the foregoing Affidavit is true and correct to the best of my knowledge and belief.

JOSE FRANCISCO A G
Jose Francisco Antunez Garcia

7/1/15
Date